Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)		
	)		
Establishment of Public Service Radio	)	RM-9405	
Pool in the Private Mobile Frequencies	)		
Below 800 MHz	)		

COMMENTS OF CONSUMERS ENERGY

Pursuant to Section 1.405 of the FCC's Rules, Consumers Energy hereby submits its Comments in support of the above-referenced "Petition for Rulemaking" filed on August 14, 1998, by UTC, The Telecommunications Association (UTC), the American Petroleum Institute (API), and the Association of American Railroads (AAR).

Introduction

As the State of Michigan's largest energy utility, Consumers Energy makes extensive use of private land mobile radio technology, below 800 MHz, in support of the generation, transmission and distribution of both electricity and natural gas. Systems in place are used for; generating plant, operations, maintenance, and site security; nuclear generating facility public warning systems, statewide electrical system voltage level maintenance, and many other key energy reliability support roles.

Comments

Private land mobile radio systems utilized by Consumers Energy in providing and

delivering energy to industry and the residents of Michigan were established to meet four critical performance needs. These four needs are: wide area coverage, high reliability, push-to-talk immediate communications, and data capability.

Wide Area Coverage

With an energy service area that covers virtually the entire lower peninsula of Michigan, there are no public network services capable of providing such wide spread coverage. Public systems concentrate their efforts on the higher populated areas only leaving vast areas of rural Michigan without any public system alternative. Private mobile radio technology has been and continues to be the only recourse available to coordinate energy delivery services in Michigan.

High Reliability

Public wireless systems that do exist in Michigan have never been able to demonstrate the high reliability capability that energy network radio systems require. The reliability during emergency conditions just isn't there. The excuse that public network downtime should be understandable because of a tornado or other major storm is unacceptable when an ability to respond to the public safety is dependent on those public networks.

Push-to-Talk Communications

Critical emergency communications require the ability to have immediate contact with groups of field work forces. This urgent type of communications can only be met by the push-to-talk capability of private land mobile radio.

Emergency response communication needs require an ability for one point, generally a control center, to have immediate communications with many field locations simultaneously. The only other option is for each message to be repeated individually to dozens of individual field workers. Emergency conditions just do not permit this.

Data Capability

Existing public wireless systems have also been slow to adopt the ability to carry data communications. Consumers Energy has made widespread use of data via wireless to speed communications and provide a higher level of energy service to the public of Michigan.

Competitive frequency coordination concepts can only lead to more frequent interference based service interruptions to our radio systems. Maintaining compliance to federal regulations for power plant security, public warning systems, and the critical energy infrastructure in Michigan cannot be placed at risk.

Disruption to energy utility private land mobile communications under emergency conditions has grave consequences. The safety of the general public depends on the ability of the energy workers to accurately receive vital instructions and to safely execute those instructions.

Conclusion

In conclusion, Consumers Energy supports the Petition for Rulemaking. The subject petition contains viable, workable solutions that can help ensure the

nations energy infrastructure providers will have access to wireless communication spectrum to support their mission of providing a safe, reliable energy supply and urges the FCC to promptly issue a Notice of Proposed Rulemaking looking toward the creation of a Public Service Radio Service as described in the Petition.

Respectfully submitted,

CONSUMERS ENERGY

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Dated: December 17, 1998

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Consumers Energy" was sent by first-class mail, postage prepaid, to the following persons this 17th day of December, 1998.

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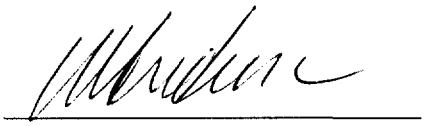

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